

Appl. No. 09/864,593  
Amdt. Dated December 9, 2005  
Reply to Office action of August 10, 2005  
Attorney Docket No. P13556-US1  
EUS/J/P/05-3322

### **REMARKS/ARGUMENTS**

#### **Claim Amendments**

Claims 8-14 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the following remarks.

#### **Claim Rejections – 35 U.S.C. § 103 (a)**

Claims 8-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Ylonen et al (US 6,438,612 B1) and further in view of Moles, et al. (US 6,725,056 B1). The Applicant respectfully traverses the rejection of these claims.

The Applicant respectfully asserts that there is no suggestion or motivation in either Ylonen or Moles to combine the references to teach the claimed invention. The Ylonen reference discloses transmitting packets between virtual routers in a network and, as noted by the Detailed Action, Ylonen does not disclose a security controller. The Moles reference is thus cited for disclosing a security controller. The security controller in Moles is connected to a BTS for extracting provisioning information from reverse channel data burst messages received from a mobile station and then reformatting the extracted provisioning data into IP data packets that are sent to the provisioning server (col.10, lines 38-41). In other words the Moles controller is controlling and reformatting data burst messages from a mobile station and sending these IP packets to a server. The Applicant's controller distributes IPSec policies to Security Process modules and when new security associations are created the SC determines the Security Process modules to receive the new SAs. The controller in Moles and the controller in the Applicant's invention perform two very different functions. The mere use of the term "security controller" should not be sufficient to include the Moles controller in an obviousness rejection. And, neither Ylonen nor Moles disclose a controller with the function as disclosed and claimed by the Applicant in claim 8.

There must be evidence that a skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. It is also clear that a rejection cannot be predicated on the mere identification of individual

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components of claimed limitations. Rather, particular findings must be made as to the reason the skilled artisan, with no knowledge of the claimed invention, would have selected these components for combination in the manner claimed. *Ecolchem Inc. v. Southern California Edison*, 56 USPQ2d 1065, 1076 (Fed. Cir. 2000).

As noted in the previous response, the Applicant's invention discloses a device and method for facilitating the management of IP packets that are associated with a Security Association (SA). There are three components including an IP forwarder for determining the destination of the packets, a plurality of security procedure modules for receiving the IP packets and a security controller (SC) for allocating negotiated SAs among the modules and sending IP packets to the security procedure module implementing the associated SA.

Applicant's claim 8 combination recites the use of a security controller to allocate negotiated SAs among particular security procedure modules. The plurality of security modules is coupled to at least one IP forwarder that receives IP packets and determines and forwards a packet to the IP packet destination. A security controller (SC) module is disclosed for distributing IPsec policies to a plurality of Security Process (SecProc) modules. When new SAs are created the SC determines the SecProc modules for placing the new SAs, and the IPFW sends the IP packets to security module implementing the associated SA.

The Detailed action cites the Ylonen reference for teaching 1) at least one IP forwarder, 2) a plurality of security procedure modules and 3) a security controller. The Detailed Action refers to Figure 3 as disclosing the at least one IP forwarder. Figures 6 and 7 are cited for disclosing the plurality of security procedure modules and Figure 4 is noted as showing an automatic key manager block and an IPSEC block that apply IKE protocol for setting up the security association.

The Applicant respectfully asserts that the above features drawn from the Ylonen and Moles references do not disclose all the features claimed in Applicant's claim 8. The combination of the Ylonen and Moles references at the very least fails to teach utilizing a security controller that allocates negotiated SAs among a plurality of security procedure modules and notifies the security procedure modules and the IPFWs

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involved, of the allocation. Nor does the combination disclose the at least one IPFW sending IP packets to particular security modules (the module associated with the associated SA).

Claims 9-13 depend from claim 8 and recite further limitations in combination with the novel elements of claim 8. Therefore, the allowance of claims 8-13 is respectfully requested.

As noted in the Detailed Action, claim 14 consists of a method of processing IP packets at a network device to implement claim 1 and is rejected by the same prior art of record. The applicant respectfully traverses the rejection of this claim.

The prior art references either individually or in combination fail to disclose identifying the security associations associated with the packets and forwarding the packets to specific security procedure modules, the security procedure modules implementing the associated SAs. The Applicant respectfully requests the withdrawal of the rejection of this claim.

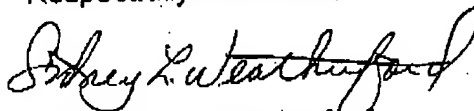
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### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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